

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

IN RE: )  
MICHAEL & CELESTIA MARTIN, ) Case No. 16-48887  
Debtors, ) Chapter 13 Bankruptcy  
U.S. BANK, N.A., )  
Movant. )

**ANSWER TO NOTICE OF BREACH**

COMES NOW Debtors, by and through undersigned counsel, and for this Answer to Notice of Breach, state to this Court as follows:

1. Debtors and Movant entered into a Stipulation Agreement on May 8, 2018, wherein Debtors agreed to pay a delinquency of \$1,141.16, minus a payment of \$390.00, over a period of three months.
2. On December 26, 2018, Movant filed a Notice of Default, stating that Debtors had fallen behind in payments.
3. Debtors are making an effort to remit payments to Movant.
4. Debtors request this Court deny Movant's Notice of Default.

WHEREFORE, Debtors pray Movant's Notice of Default be denied, and for whatever other relief this Court may deem just and proper.

/s/Robert E. Faerber  
Robert E. Faerber, #46794/60555  
Attorney for Debtors  
230 S. Bemiston, Ste. 600  
Clayton, Missouri 63105  
Tel: 314/727-3434  
Fax: 314/727-6992  
faerber@msn.com

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on January 2, 2019, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on January 2, 2019.

David Noyce  
Attorney for Movant  
11111 Nall Avenue, Suite 104  
Leawood, KS 66211

/s/Robert E. Faerber